# The National Academies of SCIENCES • ENGINEERING • MEDICINE

Elizabeth Eide, Ph.D.

Executive Director

Division on Earth and Life Studies

August 19, 2021

RFP No. PR-ORD-21-01009 Proposal No. 10005571

Vicki Soto Contracting Officer ORD/CPHEA/CPAD William Jefferson Clinton Building 1200 Pennsylvania Avenue, N.W. Mail Code: 8602R, Room No. 71205 Washington, DC 20460

Dear Ms. Soto:

In response to Solicitation No. PR-ORD-21-01009, we are pleased to submit the enclosed proposal, prepared by our Board on Environmental Studies and Toxicology (BEST), requesting support for NAS Independent External Peer Review of EPA's Draft Assessment Product – 2021: Review of EPA's Draft IRIS Assessment of Formaldehyde. The total estimated cost is \$612,809 for the period of October 1, 2021 to March 31, 2023.

This project will assist EPA by conducting an independent peer review of EPA's draft IRIS assessment of formaldehyde after its public release. For this purpose, the National Academies will recruit an ad hoc committee of subject-matter experts. The committee will assess whether EPA's draft document adequately and transparently evaluated the scientific literature, used appropriate methods to synthesize the current state-of-the science, and presented conclusions regarding the hazards identification analysis and dose-response analysis of formaldehyde that are supported by the scientific evidence.

Acceptance of funds for this activity is subject to approval by the Executive Committee of the National Research Council Governing Board at its meeting on September 14, 2021.

Dr. Kathryn Guyton is the responsible staff officer for this study. She may be contacted regarding program matters at (202) 334-3334. Business negotiations are the responsibility of Mr. Russell Walker, Contract Manager, Office of Contracts and Grants. He may be reached at 202-334-2004.

We shall appreciate your consideration of this matter.

Sincerely,

Elyabothe Eide

Elizabeth Eide, Ph.D. Executive Director

**Enclosures** 

# The National Academies of SCIENCES • ENGINEERING • MEDICINE

DIVISION ON EARTH AND LIFE STUDIES

BOARD ON ENVIRONMENTAL STUDIES AND TOXICOLOGY

Proposal No. 10005571

(RFP No. PR-ORD-21-01009)

NAS Independent External Peer Review of EPA's Draft Assessment Product – 2021: Review of EPA's Draft IRIS Assessment of Formaldehyde

AUGUST 2021

Russell Walker

Digitally signed by Russell Walker DN: cn=Russell Walker, o=National Academy of Sciences, ou=Office of Contracts and Grants, email=rwalker@nas.edu, c=US Date: 2021.08.19 15:15:54 -04'00'

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Board on Environmental Studies and Toxicology

Division on Earth and Life Studies

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This proposal is submitted by the NATIONAL ACADEMY OF SCIENCES (NAS), which assumes full technical and legal responsibility under its Act of Incorporation for the work to be carried out under any resultant agreement. The NAS is a private Federally chartered corporation exempt from federal income tax under Internal Revenue Service Code section 501(c)(3). The NAS Taxpayer Identification Number is 53-0196932. DUNS Number is 04-196-4057. Awards resulting from this proposal should be issued to NATIONAL ACADEMY OF SCIENCES and payment directed to:

National Academy of Sciences

Accounting Office
ATTN: Cash Management Section
500 Fifth Street, NW
Washington, DC 20001

Telephone: 202-334-3351 or 202-334-1476

(rev.7/7/15)

## THE NATIONAL ACADEMIES OF SCIENCES, ENGINEERING, AND MEDICINE DIVISION ON EARTH AND LIFE STUDIES BOARD ON ENVIRONMENTAL STUDIES AND TOXICOLOGY

PROPOSAL NO: 10005571

## NAS INDEPENDENT EXTERNAL PEER REVIEW OF EPA'S DRAFT ASSESSMENT PRODUCT – 2021: REVIEW OF EPA'S DRAFT IRIS ASSESSMENT OF FORMALDEHYDE

#### SUMMARY

The National Academies of Sciences, Engineering, and Medicine (National Academies) propose to assist the U.S. Environmental Protection Agency (EPA) by conducting an independent peer review of EPA's revised draft IRIS assessment of formaldehyde.

The total of \$612,809 is requested from the EPA for full support of this study. The work shall be conducted under the auspices of the National Academies Division on Earth and Life Studies Board on Environmental Studies and Toxicology (BEST).

#### BACKGROUND

Formaldehyde is a common environmental chemical that is found in indoor and ambient air. It is also present naturally in some foods and is a metabolic intermediate in the human body. Major indoor emission sources include building materials, consumer products, gas and wood stoves, kerosene heaters, and cigarettes. For ambient air, major emission sources include power plants, incinerators, refineries, manufacturing facilities, forest fires, and automobiles.

Exposure to formaldehyde may cause cancer and other adverse health effects. Given the widespread exposures to the general public and concerns about health impacts, EPA has been working to develop noncancer and cancer assessments of formaldehyde for its Integrated Risk Information System (IRIS). Initial IRIS assessments were released in the 1990s, and an updated June 2010 draft underwent independent scientific review by an ad hoc committee convened by the National Academies. The resulting 2011 report from the National Academies addressed specific aspects of EPA's draft assessment, including derivation of the noncancer reference concentrations and the cancer unit risk estimates for formaldehyde. The report provided specific recommendations for improving the IRIS assessment of formaldehyde as well as general comments on the IRIS assessment development process.

EPA plans to release a revised and updated draft of the IRIS assessment of formaldehyde for a 60-day public comment period as soon as October 2021. EPA is seeking assistance from the National Academies for the conduct of an independent peer review of the revised draft formaldehyde assessment after its public release.

#### STATEMENT OF TASK

The National Academies of Sciences, Engineering, and Medicine will conduct an independent peer review of EPA's revised draft IRIS assessment of formaldehyde. For this purpose, the National Academies will recruit an ad hoc committee of subject-matter experts. The committee will assess whether EPA's draft document adequately and transparently evaluated the scientific literature, used appropriate methods to synthesize the current state-of-the science, and presented conclusions regarding the hazards identification analysis and dose-response analysis of formaldehyde that are supported by the scientific evidence. The committee will not develop its own hazard assessment of formaldehyde, nor will the committee address the broader aspects of the IRIS Program.

Recommendations about the IRIS assessment will be prioritized as follows:

- Tier 1: recommended revisions that are important for EPA to consider and address to improve critical scientific concepts, issues, or narrative in the assessment.
- Tier 2: suggested revisions that are encouraged to strengthen or clarify the scientific concepts, issues, or narrative in the assessment but are not critical. Other factors, such as agency practices and resources, might need to be considered by EPA before undertaking the revisions.
- Tier 3: considerations that might inform future evaluations of key science issues or inform development of future assessments.

#### **WORK PLAN**

#### Task 1 - Review of EPA's Draft Assessment Document

An ad hoc committee of the National Academies of Sciences, Engineering, and Medicine will conduct an independent peer review of the revised IRIS draft assessment of formaldehyde (the IRIS *Toxicological Review* and supplemental appendices). The review will be carried out in accordance with the National Academies consensus study process (see: <a href="https://www.nationalacademies.org/about/our-study-process">https://www.nationalacademies.org/about/our-study-process</a>). Based on charge questions to be provided by EPA, the peer review will consider whether the relevant scientific literature was adequately evaluated by EPA, and whether appropriate methods were used to synthesize the current state-of-the science. The peer review will evaluate whether the conclusions regarding the hazards identification analysis and dose-response analysis of formaldehyde are supported by the scientific evidence. The committee will not develop its own hazard assessment of formaldehyde, nor will the committee address the broader aspects of the IRIS Program.

EPA shall provide the National Academies with timely access to the charge questions, the assessment documentation (e.g., the IRIS *Toxicological Review*, supplemental assessment documents in PDF format via the <u>IRIS website</u>), as well as any relevant tools and background information informative for committee deliberations. A provisional timeline is provided below that is contingent upon receipt of the publicly available IRIS *Toxicological Review* and appendices no later than November 30, 2021. National Academies staff will coordinate with EPA prior to initiating Task 1 and notify EPA prior to any public notifications and/or actions. Task 1 consists of three (3) subtasks.

#### Subtask 1.1. – Establish expert panel

Prior to the initiation of the peer review and immediately upon award of this task order, National Academies staff will establish an expert panel of approximately 12 experts.

Nominations for committee membership will be sought from a broad range of sources, including academia, non-governmental/public interest organizations, private industry, and federal, state, tribal, and local governments. Membership in the NAS, NAE, or NAM and previous involvement in National Academies studies are taken into account in committee selection. The inclusion of women, minorities, and young professionals and geographic diversity are additional considerations. The committee will be formed in accordance with the National Academies policies concerning conflict of interest and bias to ensure a balanced and objective study.

The EPA may offer suggestions of potential committee members to be considered by the National Academies during its nominations process. EPA may also comment on the proposed committee membership during the 20-day comment period following announcement of the provisional committee. The National Academies will select the committee members.

Relevant areas of expertise include the following:

- Public health risk assessment expertise, especially current experience supporting
  regulatory decisions in the context of the available scientific information for public health
  and environmental protection (e.g., international or state risk assessors). It would be
  preferable if such expert(s) has demonstrated experience with systematic review
  methods for environmental exposures;
- Environmental/occupational epidemiology, especially in the areas of cancer, reproductive, asthma and other immunological effects, and respiratory effects (i.e., multiple experts are needed);
- Toxicology, especially in the areas of cancer, respiratory effects, neurotoxicology, and/ or reproductive/developmental toxicology. At least one of these experts should have experience with biological modeling (e.g., toxicokinetic/dosimetric modeling);
- Exposure measures for observational epidemiology studies of environmental and occupational exposures; and
- Dose-response analysis of environmental chemicals, especially current experience with data analysis for human exposure studies, including observational studies.

#### Subtask 1.2. – Conduct an independent peer review and convene public meeting(s)

The committee will conduct an independent peer review of the publicly released draft formaldehyde assessment and related materials. Prior to the committee's first meeting, EPA is expected to provide the National Academies with timely access to the charge questions, the external peer review draft assessment and all associated materials and tools, as well as any public comments received. The National Academies will organize one or more public meeting(s) for the committee to gather information from the sponsor, researchers, the public, and other interested parties. Such public meeting(s) will not exceed 8 total hours and will include an

opportunity for written and oral public comments to be submitted to the committee. The committee will hold additional closed meetings.

### Subtask 1.3. – Prepare Committee Report Based upon Listed Tier Levels

The committee will develop a draft report of its evaluation of the EPA assessment. The committee's draft report will undergo independent external review following standard processes of the National Academies. Specifically, the committee will respond to reviewer comments received, revise the report as needed, and submit responses to reviewer comments and the revised report for National Academies approval. Once approved, the pre-publication report will be delivered to EPA and publicly released in November 2022 (see provisional timeline), contingent upon receipt of the publicly available IRIS *Toxicological Review* and appendices no later than November 30, 2021. The committee's report will promote clarity and the timely completion of the draft assessment materials (i.e., the IRIS *Toxicological Review* and supplemental appendices) by prioritizing and/or tiering recommendations provided to EPA under the following system:

Tier 1: Recommended Revisions—Important revisions for EPA to consider and address in order to improve the critical scientific concepts, issues, and/or narrative within the assessment.

Tier 2: Suggested Revisions – Revisions that are encouraged to strengthen or clarify the scientific concepts, issues, and/or narrative within the assessment but are not critical. Other factors (e.g., Agency practice and resources) may need to be considered by EPA before undertaking these revisions.

Tier 3: Future Considerations— Useful and potentially informative scientific exploration that may inform future evaluations of key science issues and/or inform the development of future assessments. These recommendations are likely outside the immediate scope and/or needs of the assessment under review.

#### VIII. Deliverables

#### The products of the National Academies tasks for activity are as follows:

- a) Written progress reports will be provided to the Contracting Officer (CO), Contract Level Contracting Officer Representative (CL COR), and Task Order Contracting Officer Representative (TOCOR) quarterly, and will include updates on meetings and project milestones.
- b) Task 1, Subtask 1.2. For all public meetings of the committee, the CO, CL COR, and TOCOR will be informed via email of the time, location, and agenda of the meeting 45 days, or as early as practicable, prior to the meeting. All communications regarding public meetings will go through the CO, CL COR, and TOCOR. The National Academies will provide EPA with a final list of all meeting attendees and public commenters within five (5) business days after the meeting. As needed, arrangement and provision of transportation, lodging, and any other logistical support for meeting participants shall be provided. The CO and TOCOR will be notified of any public websites or similar means used to disseminate information to the public during the course of this task, as well as relevant changes to them.

c) Task 1, Subtask 1.3. - The primary products for the review are expected to be:

 (a) provisional and final lists of committee members including biographical sketches,
 (b) written confirmation that review of potential COI and partiality issues for each expert was completed in accordance with National Academies procedures, (c) any public comments submitted to the committee for consideration, and (d) a final peer review report.

Provisional Timeline\*

Oct 1, 2021: Project begins

Nov 2021: EPA's submittal of the publicly available IRIS *Toxicological Review* and supplemental appendices to the National Academies project staff.

Dec 2021: Provisional committee established.

January – August 2022: Committee meetings and draft report generation, including:

- Public session for information-gathering that will not exceed 8 total hours and will include an opportunity for written and oral public comments to be submitted to the committee;
- Approximately three additional closed sessions for committee deliberation and report generation;
- Submission of draft report for National Academies review.

September- November 2022: Response to reviewer comments and submission of revised report for National Academies approval.

November 2022: Prepublication report to EPA and release to the public.

December 2022–March 2023: Report dissemination activities. National Academies Press prepares a final version of the committee's report.

March 31 2023: End of project

\* This provisional timeline is contingent upon receipt of the publicly available IRIS *Toxicological Review* and appendices no later than November 30, 2021. If there is a substantial delay in receiving the draft assessment from EPA, the project schedule may need to be revised. The actual number of committee meetings will be based upon the committee's plans for carrying out its study. The committee will conduct meetings, including the public sessions, as virtual meetings, if in-person is not feasible. One or more in-person meetings might be replaced by multiple shorter virtual meetings.

### FEDERAL ADVISORY COMMITTEE ACT (FACA)

The Academy has developed policies and procedures to implement Section 15 of the Federal Advisory Committee Act, 5 U.S.C. App. Section 15 includes certain requirements regarding

public access and conflicts of interest that are applicable to agreements under which the Academy, using a committee, provides advice or recommendations to a Federal agency. In accordance with its Congressional Charter and the requirements of Section 15, the Academy must provide independent, unbiased advice without actual or perceived interference or management of the outcome (findings and recommendations). Therefore, the Academy requires the right to publish all unclassified materials without any restriction over content and release, including any restriction that may require prior approval from the sponsoring agency. In accordance with Section 15 of FACA, the Academy shall submit to the government sponsor(s) following delivery of each applicable report a certification that the policies and procedures of the Academy that implement Section 15 of FACA have been substantially complied with in the performance of the contract/grant/cooperative agreement with respect to the applicable report.

#### PUBLIC INFORMATION ABOUT PROJECTS

In order to afford the public greater knowledge of the National Academies activities and an opportunity to provide comments on those activities, the National Academies posts on its website (http://www.nationalacademies.org) the following information as appropriate under its procedures: (1) notices of meetings open to the public; (2) brief descriptions of projects; (3) committee appointments, if any (including biographies of committee members); (4) reports; and (5) any other pertinent information. Notices of public sessions at committee meetings are posted on the National Academies website at least 10 business days in advance. Anyone is free to attend. Public comments can be provided during public sessions.

#### **ESTIMATE OF COSTS**

The estimated cost for this study is **Ex. 4 CBI** ver an 18-month period. The period of performance is October 1, 2021 through March 31, 2023.

### THE NATIONAL ACADEMY OF SCIENCES

## DIVISION ON EARTH AND LIFE STUDIES

## BOARD ON ENVIRONMENTAL STUDIES AND TOXICOLOGY

## Proposal No. 10005571

## NAS Independent External Peer Review of EPA's Draft Assessment Product – 2021: Review of EPA's Draft IRIS Assessment of Formaldehyde

EPA Cumulative Summary Estimate of Costs

10/1/21 to 03/31/23

		Year 1	Year 2	Project Total
Direct Labor Overhead Overhead Cost of Money Travel Reports Technology/Communication Meeting Expense Other Direct Costs				\$232,368 \$125,618 \$12,238 \$67,130 \$10,000 \$21,155 \$16,480 <u>\$1,115</u>
	Subtotal:	Ex. 4	CBI	\$486,105
General and Administrative Costs G&A Cost of Money				\$122,542 \$4,162
	Total:			\$612,809
Amount Requested From EPA				

It is requested that the award will provide for payment via Letter of Credit or electronic transfer.

Footnote: These major cost categories reflect the billing structure used by the National Academy of Sciences. Cost and rate data are attached as background information. Please be advised, however, that all costs are systematically collected in our accounting system and are available for audit through arrangements with the Defense Contract Audit Agency and our cognizant Administrative Contracting Officer at the Office of Naval Research.

## THE NATIONAL ACADEMY OF SCIENCES

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## NAS Independent External Peer Review of EPA's Draft Assessment Product – 2021: Review of EPA's Draft IRIS Assessment of Formaldehyde

## **Estimate of Costs**

10/1/21 to 9/30/22 12 months **DIRECT LABOR, ON-SITE** Annual Percent Total Project Totals of Time Salary Salary **EXEMPT Board Director** Senior Program Officer/BEST Senior Program Officer/HMD Ex. 4 CBI Associate Program Officer Finance Business Partner Director, Comms/Media Comms/Media Specialist TOTAL EXEMPT Ex. 4 CBI **NON-EXEMPT** Program Associate Ex. 4 CBI TOTAL NON-EXEMPT

Total Salaries
Salary Adjustments (see Footnote 2)

Total Direct Labor, On-Site (see Footnote 3)

Fringe Benefits @ Ex. 4 CBI f salaries Ex. 4 CBI

TOTAL DIRECT LABOR, ON-SITE, PLUS FRINGE

SUBTOTAL (On-site Overhead Base)

OVERHEAD, On-site

COST OF MONEY (Labor)

TOTAL OVERHEAD, On-Site (see Footnote 1)

of base of base

OTHER DIRECT COSTS

## **Travel Expenses (Domestic)**

	#Pers.	#Mtgs	Days/ Mtg	#Per X Mtg.	Mtg Cost	\$\Mtg	Subtotal
Cmte/DC	12	3	2	36	\$1,246	\$44,856	
Invitees/DC	3	1	1	3	\$787	\$2,361	\$44,856
IIIVII e e s/DC	3	'	1	3	ψ/ Ο/	φ2,301	\$2,361
Adjustment for working meals provided (see Footnote 7)						-\$1,776	
Total Domesti	c Travel						\$45,441

Total Travel \$45,441

Other Costs

Photocopies (see Footnote 5)

**Postage and Delivery** 

Project

**Technology/Communications** 

Conference Calls

Technology Services (see Footnote 6)

Office supplies

**Meeting Expenses** 

Working meals/Coffee Service

Webcasting

**Total Meeting Expenses** 

**Total Other** 

**TOTAL OTHER DIRECT COSTS** 

**SUBTOTAL** 

General & Administrative Costs Cost of Money Ex. 4 CBI

Ex. 4 CBI

TOTAL GENERAL AND ADMINISTRATIVE COSTS (see Footnote 1)

Ex. 4 CBI

TOTAL ESTIMATED COST

**Amount Requested From EPA** 

Ex. 4 CBI

It is requested that the award will provide for payment via Letter of Credit or electronic transfer.

## THE NATIONAL ACADEMY OF SCIENCES

### DIVISION ON EARTH AND LIFE STUDIES

## BOARD ON ENVIRONMENTAL STUDIES AND TOXICOLOGY

Proposal No. 10005571

## NAS Independent External Peer Review of EPA's Draft Assessment Product – 2021: Review of EPA's Draft IRIS Assessment of Formaldehyde

## **Estimate of Costs**

10/1/22 3/31/23 to

months

DIRECT LABOR, ON-SITE

**EXEMPT** 

**Board Director** Senior Program Officer/BEST Senior Program Officer/HMD Associate Program Officer Finance Business Partner Director, Comms/Media Comms/Media Specialist Editorial Projects Manager

TOTAL EXEMPT

NON-EXEMPT

Program Associate

TOTAL NON-EXEMPT

Total Salaries Salary Adjustments (see Footnote 2)

Total Direct Labor, On-Site (see Footnote 3)

Fringe Benefits @

TOTAL DIRECT LABOR, ON-SITE, PLUS FRINGE

SUBTOTAL (On-site Overhead Base)

OVERHEAD, On-site COST OF MONEY (Labor)

TOTAL OVERHEAD, On-Site (see Footnote 1)

Total Project Percent Annual Totals of Time Salary Salary

Ex. 4 CBI

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Ex. 4 CBI

## **OTHER DIRECT COSTS**

## **Travel Expenses (Domestic)**

#P	ers.	#Mtgs	Days/ Mtg	#Per X Mtg.	Mtg Cost	\$\Mtg	Subtotal
Cmte/CA	12	1	2	12	\$1,246	\$14,952	
Briefing	3	1	1	3	\$787	\$2,361	
							\$17,313
Staff/CA	4	1	2	4	\$1,246	\$4,984	
							\$4,984
Adjustment for v	working me	als provided (s	ee Footnote	: 7)			-\$608
	- 1						<b>#01</b>
Total Domestic 1	Iravel						\$21,689

Total Travel \$21,689

Other Costs

Reports (see Footnote 4)

Master Manuscript

**Total Reports** 

Photocopies (see Footnote 5)

Postage and Delivery

Project

Report disseminations

**Technology/Communications** 

Conference Calls

Technology Services (see Footnote 6)

Office supplies

**Meeting Expenses** 

Working meals/Coffee Service

Total Meeting Expenses

**Total Other** 

TOTAL OTHER DIRECT COSTS

**SUBTOTAL** 

General & Administrative Costs

Cost of Money

Ex. 4 CBI

TOTAL GENERAL AND ADMINISTRATIVE COSTS (see Footnote 1)

TOTAL ESTIMATED COST

**Amount Requested From EPA** 

It is requested that the award will provide for payment via Letter of Credit or electronic transfer.

Ex. 4 CBI

Ex. 4 CBI

## **FOOTNOTES**

- 1. The use of all indirect cost rates in this proposal have been negotiated and agreed upon with the National Academy of Sciences' cognizant Administrative Contracting Officer, the Office of Naval Research. For contract billing purposes, the National Academy of Sciences will invoice at the negotiated indirect rates in effect for the period being billed. It is understood that any contractually-stipulated indirect rate will be revised in accordance with any subsequent negotiated indirect rate agreement upon the effective dates applicable to such revised rates.
- 2. An annual adjustment is applied to the salary base to provide for merit increases that will be awarded during the performance period of any award resulting from this proposal. The efficitive date for estimating such adjustments is June 1. The current merit pool is

  | Ex. 4 CBI |
- 3. Direct Labor includes an accrual for personal leave, holidays, and other leave, such as jury duty and military service, at a rate of <a href="Ex.4 CBI">Ex. 4 CBI</a>
- 4. Reports

## **Master Manuscript production copies**

Estimated report per copy cost Estimated total report charge

### Report production copies

Estimated report per copy cost Estimated total report charge

#### **HTML Conversions**

Estimated report per copy cost Estimated total report charge

Ex. 4 CBI

Executive Order 12832 provides the authority for NAS to reproduce and disseminate Academy reports to the public as needed and therefore we have included in our estimate of costs an amount projected to cover the cost of producing and disseminating reports for this activity.

5. Copying

Copying is estimated on a monthly basis. The total estimated copying charge is derived by determining the total estimated number of pages that might be reproduced based on similar projects undertaken by NAS and multiplying by the per copy cost. The current per copy cost is estimated

[Ex. 4 CBI]

6. Technology Services

(Total Full-time Equivalent employees reflected in estimated salaried staff and on-site borrowed personnel percent of time in Direct Labor section of estimate.)

Technology Services Cost

Ex. 4 CBI

The technology rate is calculated as a service charge, and includes hardware, software, equipment maintenance, on-site support, help desk support, internal network connection, internet connection, email and telecom infrastructure. The monthly rate is determined by multiplying the technology services charge times the total number of FTEs times the number of pay periods in a year (26), and then dividing that number by the number of months in a year (12). The total estimated cost is then calculated by multiplying the monthly rate times the number of months covered by this cost estimate.

- 7. If working meals are included in this cost estimate, travel costs have been reduced by the per diem costs otherwise applicable to individuals in travel status.
- 8. National Academies Press (NAP) Personnel Charges are the direct labor costs associated with the provision of publication services including but not limited to project management, composition, cover and figure design, copyediting, proofreading, digitization, ADA/508 compliance, and open access online posting.
- 9. The National Academies Press (NAP) Administrative (Admin) Fee is an allocation of NAP management expenses including but not limited to administration, training, equipment rental, hardware/software maintenance and other costs incurred in support of management and oversight of overall NAP operations. The NAP Admin fee is applied to final and other cost objectives based on actual NAP staff hours charged to those final and other cost objectives.

Federal Negotiated Indirect Cost Rate Agmt - 12/06/19 NAS FY 20-21 FIXED RATES Ex. 4 CBI Offsite Overhead Regular Overhead Flow-through Admin G&A Leave Fringe PRICES Prices are determined on an actual-cost basis, but are not included in the Negotiation Agreement with ONR. Ex. 4 CBI

Copy Center

Pay Periods